

AO 91 (Rev. 02/09) Criminal Complaint

United States District Court
Southern District of Texas
FILED**UNITED STATES DISTRICT COURT**

APR 13 2018

for the
Southern District of Texas

David J. Bradley, Clerk of Court

United States of America
v.

Case No.

B-18-371-MJ

1. Elizabeth CASTILLO-Pesina
2. Alejandra GALVAN-Castillo*Defendant***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of April 12, 2018 in the county of Cameron in the Southern District of
Texas, the defendant violated 18 U.S.C. § 554 and 371,

an offense described as follows:

Knowingly conspired to export or send from the United States, or attempt to export or send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, or receives, conceals, buys, sells, or in any manner facilitates the transportation, concealment, or sale of such merchandise, article or object, prior to exportation, knowing the same to be intended for the exportation contrary to any law or regulation of the United States, to wit: 20 rounds of 7.62x39 caliber ammunition and 20 rounds .223 caliber ammunition.

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.*Complainant's signature*

Christopher Roberts, HSI Special Agent

*Printed name and title*Submitted by reliable electronic means, sworn to and signature attested
as per Fed. Rules Cr. Proc. 4.1Date: April 13, 2018*Judge's signature*City and state: Brownsville, Texas

Ignacio Torteja III, U.S. Magistrate Judge

Printed name and title

Attachment A

On April 12, 2018, United States Customs and Border Protection Officers (CBPOs) at the Los Indios Port of Entry, Brownsville, TX, encountered Elizabeth CASTILLO-Pesina and Alejandra GALVAN-Castillo attempting to depart the United States driving a Ford F-150. CBPOs conducted an outbound inspection of CASTILLO and GALVAN. CASTILLO and GALVAN provided negative declarations for money, ammunition, and firearms. A secondary inspection of CASTILLO's vehicle revealed 1 box of 7.62 caliber ammunition and 1 box of .223 caliber ammunition concealed inside the tailgate of the vehicle.

HSI Special Agents conducted an interview of CASTILLO and GALVAN.

Homeland Security Special Agents (SAs) advised CASTILLO and GALVAN of their Miranda Rights in Spanish. They waived their rights and agreed to speak with SAs. CASTILLO admitted that she smuggled and delivered ammunition earlier in the week to an individual in Matamoros, Tamaulipas, Mexico. CASTILLO further stated she knew it was illegal to take ammunition from the United States into Mexico and that she has never applied for a license to export ammunition to Mexico. GALVAN admitted to agreeing to purchase ammunition for CASTILLO and was going to receive an undisclosed amount of currency for purchasing the ammunition.

During the interview CASTILLO advised agents that they had purchased ammunition at two local Federal Firearms Licensed (FFL) dealers with intentions of smuggling the ammunition to Mexico. Based on the information provided during the interviews, a consensual search of a residence in San Benito, TX, was given and an additional 920 rounds of .223 caliber ammunition; 500 rounds of .308 caliber ammunition and 2 rounds of 9mm ammunition was seized.

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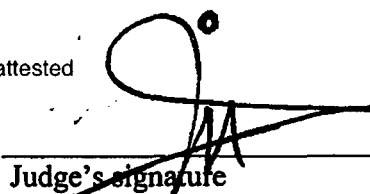
Complainant's signature

David J. Bradley, Clerk of Court

Christopher Roberts, HSI Special Agent
Printed name and title

Submitted by reliable electronic means, sworn to and signature attested
as per Fed. Rules Cr. Proc. 4.1

Date: April 13, 2018



Judge's signature

City and state: Brownsville, TX

Ignacio Torteya III, Magistrate Judge
Printed name and title